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19 COMMONWEALTH LAND TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27
28 HSBC BANK USA, NATIONAL
29 ASSOCIATION, AS TRUSTEE FOR
30 LEHMAN MORTGAGE TRUST
31 MORTGAGE PASS-THROUGH
32 CERTIFICATES SERIES 2006-7,

33 Plaintiff,

34 vs.

35 FIDELITY NATIONAL TITLE GROUP,
36 INC., et al.,

37 Defendants.

Case No.: 2:20-cv-02280-RFB-BNW

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
COMMONWEALTH LAND TITLE
INSURANCE COMPANY'S TIME TO
RESPOND TO MOTION FOR
REMAND [ECF No. 10] AND MOTION
FOR FEES AND COSTS [ECF No. 11]**

(Third Request)

1 Defendant Commonwealth Land Title Insurance Company (“Commonwealth”) and
2 Plaintiff HSBC Bank USA, National Association, as Trustee for Lehman Mortgage Trust
3 Mortgage Pass-Through Certificates Series 2006-7 (“HSBC”) (collectively, the “Parties”), by and
4 through their counsel of record, hereby stipulate and agree as follows:

- 5 1. On December 16, 2020, HSBC filed its Complaint in the Eighth Judicial District
6 Court, Case No. A-20-826559-C [ECF No. 1-1];
- 7 2. On December 16, 2020, Commonwealth filed a Petition for Removal to this Court
8 [ECF No. 1];
- 9 3. On January 14, 2021, HSBC filed a Motion for Remand [ECF No. 10];
- 10 4. On January 14, 2021, HSBC filed a Motion for Costs and Fees [ECF No. 11];
- 11 5. Commonwealth’s deadline to respond to HSBC’s Motion for Remand and Motion for
12 Costs and Fees is currently March 4, 2021;
- 13 6. Commonwealth’s counsel is requesting an extension until Thursday, March 18, 2021,
14 to file its response to the pending Motion for Remand and Motion for Costs and Fees;
- 15 7. Commonwealth requests a brief extension of time to respond to the Motion for
16 Remand and Motion for Costs and Fees to afford Commonwealth additional time to
17 respond to the legal arguments set forth in HSBC’s motions;
- 18 8. HSBC does not oppose the requested extension;
- 19 9. This is the third request for an extension which is made in good faith and not for
20 purposes of delay;

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1 **IT IS SO STIPULATED** that Commonwealth's deadline to respond to HSBC's Motion
2 for Remand [ECF No. 10] and Motion for Costs and Fees [ECF No. 11] is hereby extended
3 through and including March 18, 2021.

4
5 Dated: March 3, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant COMMONWEALTH
LAND TITLE INSURANCE COMPANY

10 Dated: March 3, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
12 KEVIN S. SINCLAIR
13 Attorneys for Defendant COMMONWEALTH
LAND TITLE INSURANCE COMPANY

14 Dated: March 3, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins
16 LINDSAY D. ROBBINS
17 Attorneys for Plaintiff HSBC BANK USA,
N.A.

18 **IT IS SO ORDERED:**

19
20 Dated: March 3, 2021.

21 
22 **RICHARD E. BOULWARE, II**
23 **United States District Court**

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

